



**COMMUNICATIONS
IMAGE TECHNOLOGIES, INC.**

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JAN 27 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Ex Parte - Tariff Streamlining (CC Docket No. 96-187)

Dear Mr. Caton:

This is to advise that Lee Jones - Vice President, Robert Sessions - Director IT and I met with Patrick Donovan, Esq. and Ms. Judy Nitsche of the Competitive Pricing Division of the Common Carrier Bureau on Monday, January 27, 1997 to discuss system design options, including the update and tariff maintenance process, relative to the development of an electronic filing system for use by the Regional Bell Operating Companies and Local Exchange Carriers.

An overview of the items discussed is provided below. Suggestions and recommendations for an electronic filing system included:

1. System architecture designed to handle filings at all levels of volume
 - facilitation of optimum Internet usage. To this end, we would strongly suggest that any proposal contain multiple remote sites throughout the United States
 - a minimum of three forms of back-up be maintained in different locations to avoid loss of files and facilitate recovery if necessary
2. An electronic filing system that puts no undue burden on carriers to file tariff information
 - allowing carriers to use existing word processing packages and subsequently utilize freeware such as PDF Write to submit filings in a standard PDF format
 - provision for encryption of confidential documents related to certain documents filed
 - the ability to file reliably even under tight time constraints without constriction by possible equipment failure, inoperative phone lines, or traffic on the Internet
 - that when a tariff filing is received at the Commission or any remote site, such filing would be automatically time and date stamped, and the FCC as well as the filing party would automatically be notified of receipt of the filing, even if the FCC's server was unavailable

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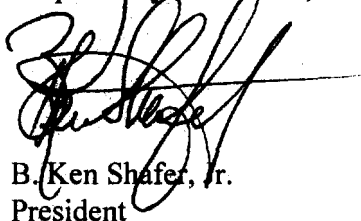
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3. An electronic filing system that puts no undue burden on public access to tariff information
 - Commission's use of freeware to allow access for users to view any public document; a good example would be Adobe Acrobat which utilizes PDF format
 - provision of efficient access to carriers' complete tariffs as well as transmittals as they are filed
4. An electronic filing system whereby the Commission is able to maintain regulatory oversight and control without extensive outlay of resources
 - it is our belief that requiring carriers to file complete effective tariffs on a monthly basis will lead to immeasurable problems and complaints, which could very easily overcome the FCC's productivity gains realized in using an electronic filing system
 - to prevent such problems and complaints, it is recommended that a document management system be implemented to receive and update tariffs and related transmittals on Commission's premises either by the Commission or a sub-contractor of the FCC

It was also discussed that Communications Image Technologies, Inc. has significant experience in this type of endeavor and stands ready to provide any input or assistance the Commission would find helpful.

Two copies of this notice are filed in accordance with section 1.1206(a)(1) of the Commission's rules.

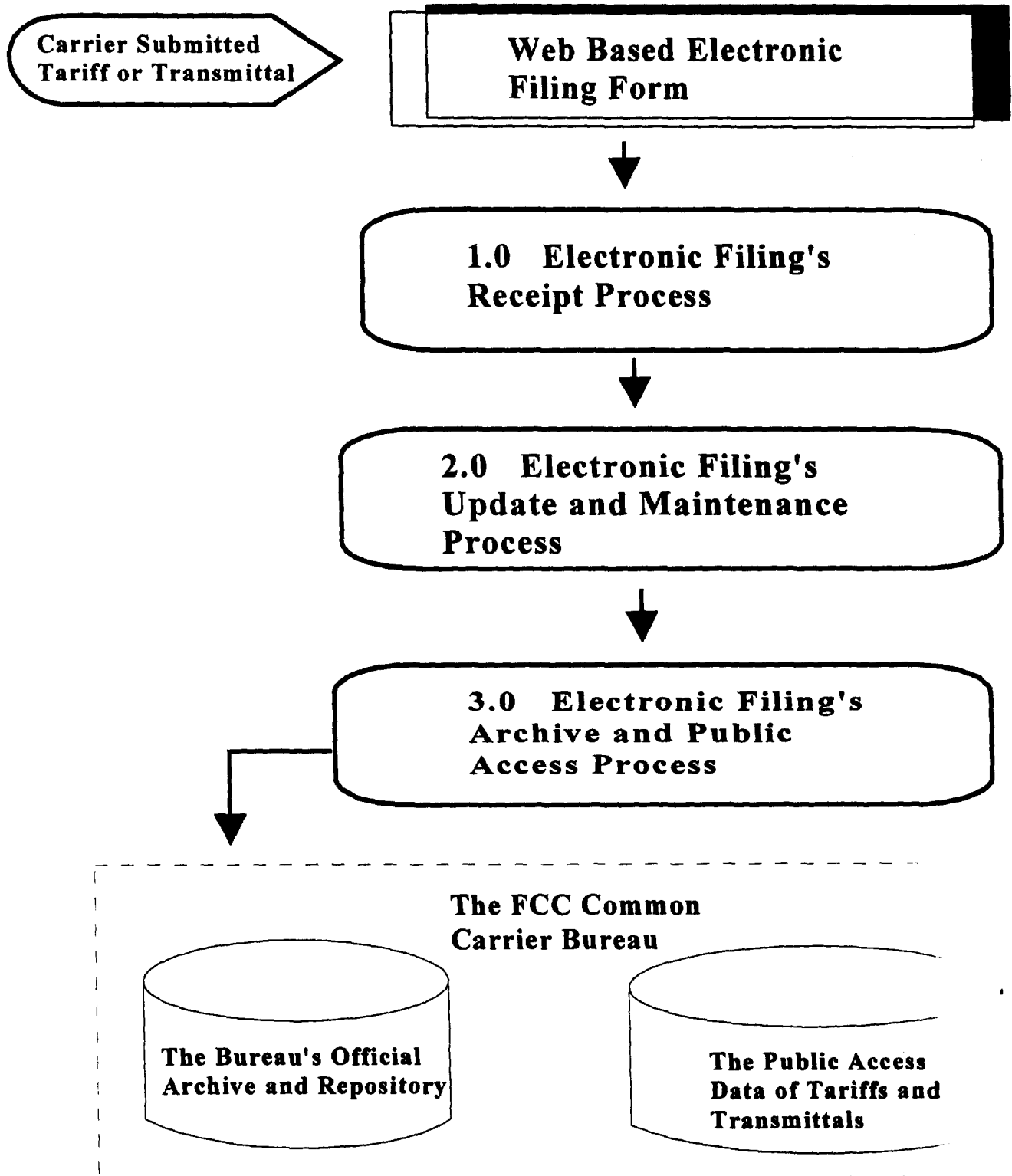
Respectfully submitted,



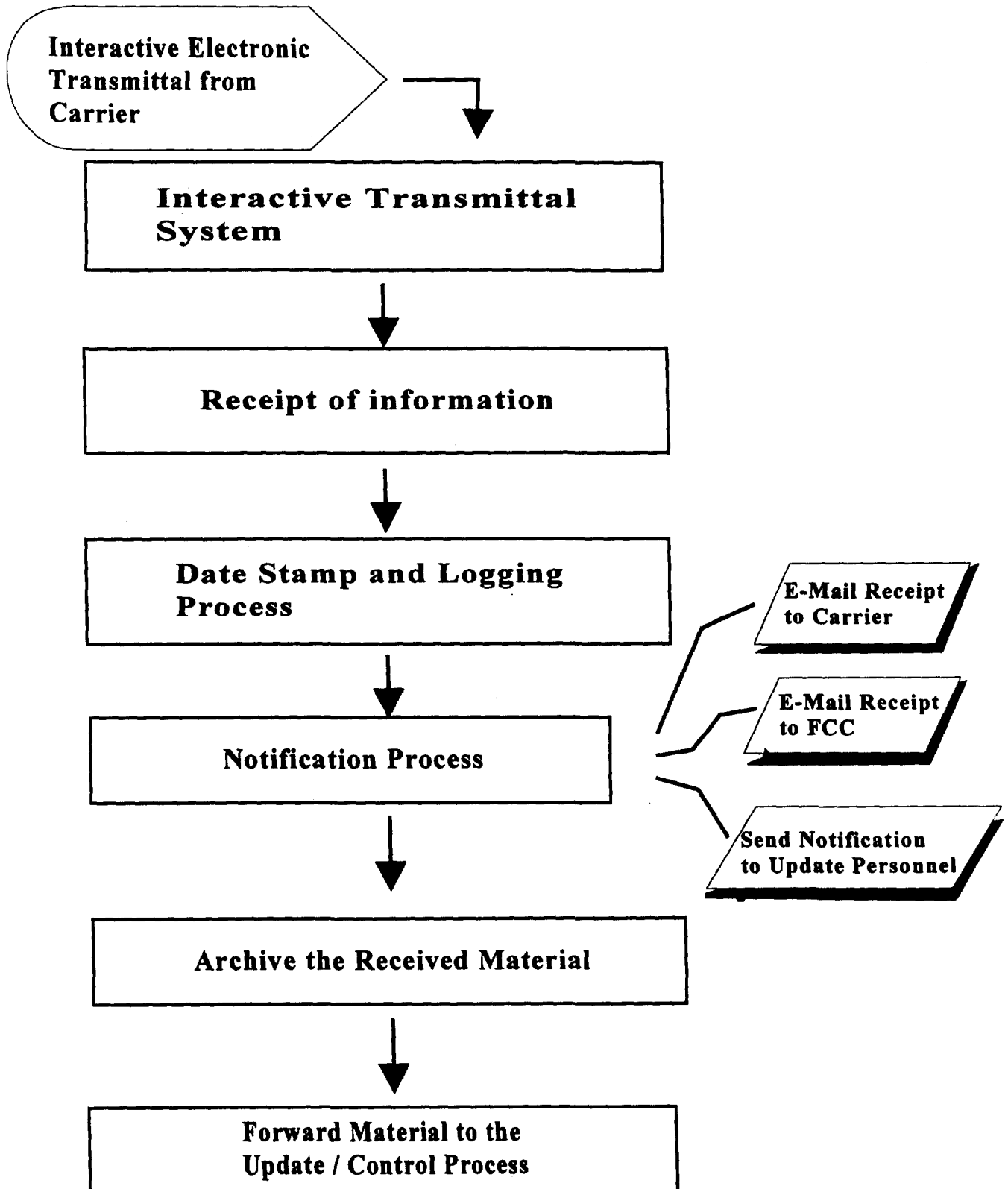
B. Ken Shafer, Jr.
President

C: Judy Nitsche

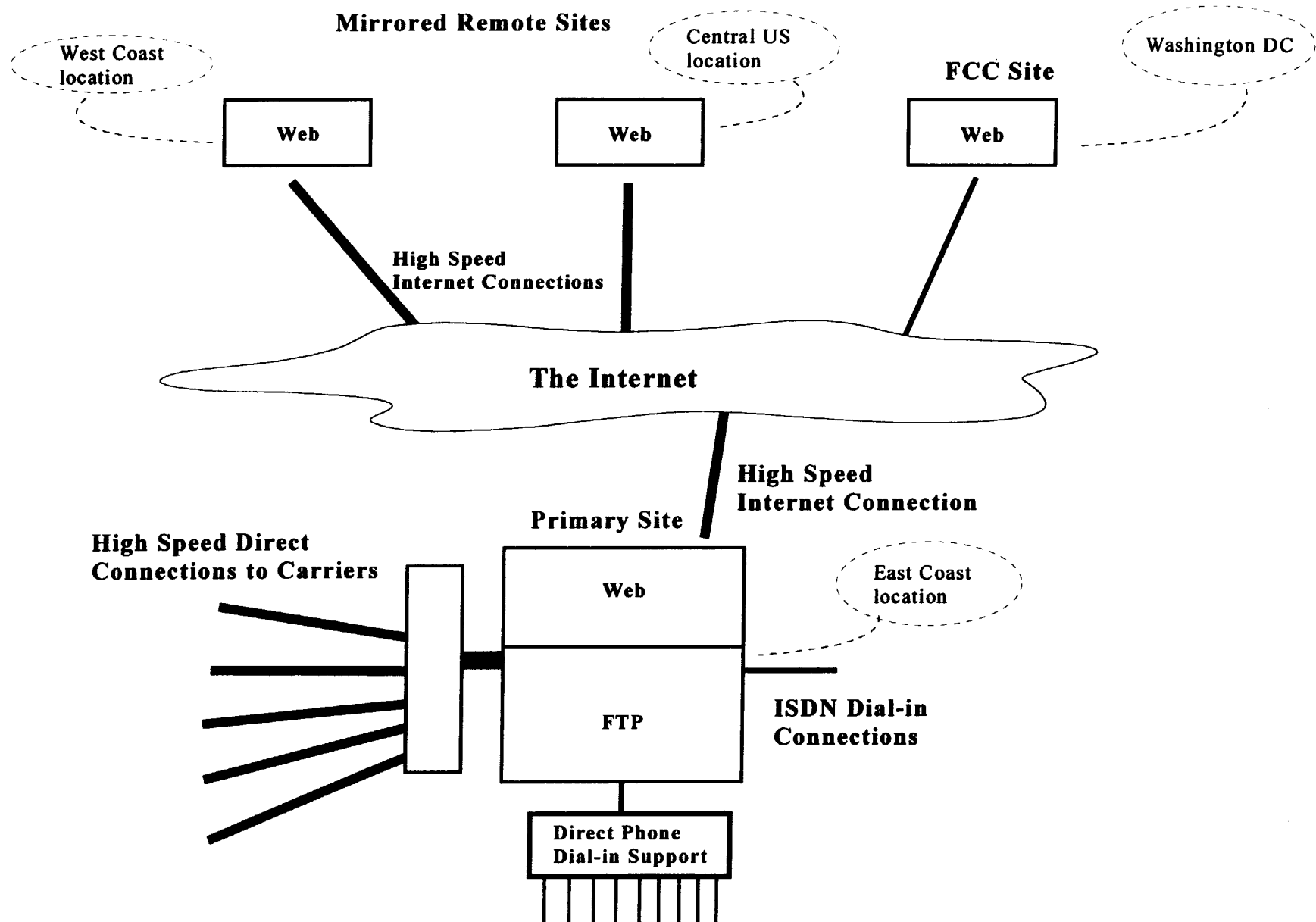
Proposed FCC Electronic Tariff Filing System



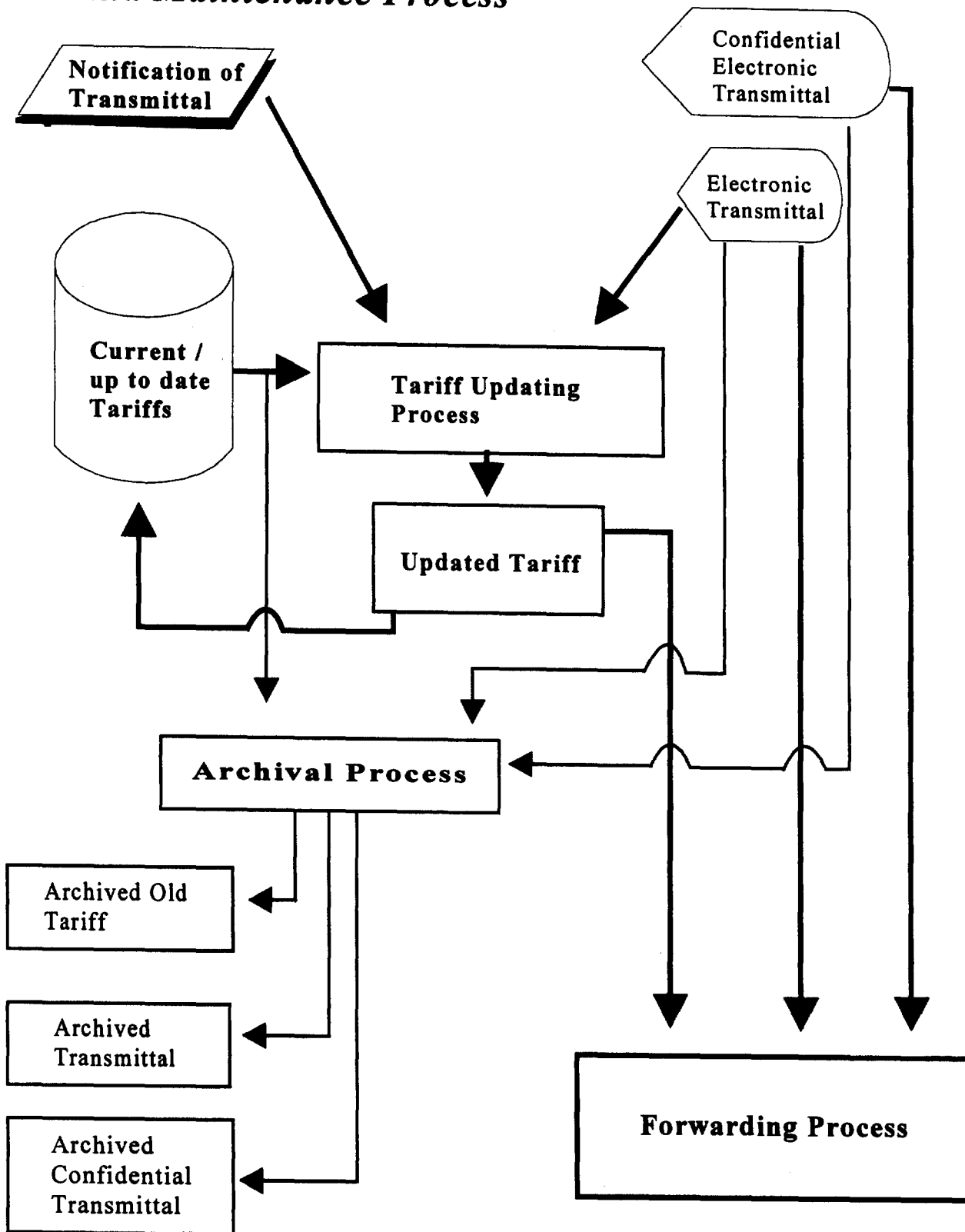
1.0 Proposed Electronic Tariff Filing Receipt Process



1.1 Proposed Electronic Tariff Filing Receipt Process Infrastructure.



2.0 Proposed Electronic Tariff Filing Update and Maintenance Process



3.0 Proposed Electronic Tariff Filing Archive and Public Access Delivery

